

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

STEVEN RICHMOND; and)
COMMONWEALTH SECOND AMENDMENT, INC)
Plaintiffs)
)
v.)
MICHAEL PERAINO, Chief of the Town of Hingham) Docket No. 15-cv-10933
Department of Police;)
Defendants)

AFFIDAVIT OF COUNSEL

I, Jeffrey Scrimo, do hereby state and affirm the following based upon personal knowledge, information and belief:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and in the Massachusetts Federal Court.
2. I represent Plaintiff Richmond in the above-entitled matter.
3. In the present matter I kept the time records attached as Exhibit B in the following manner: For all work done in this matter, I utilized a digital timer to record my time spent working. For work done in my office, I utilized a timer on my computer associated with my office's time keeping program. For work done in the law library, I utilized a timer on my smart phone designated to the purpose. I would start the timer when I started working, pause it when taking a break or working on other matters, and stop the timer when I completed working for the day. I would then enter highlights of my progress and work into the time keeping program before saving the time entry.
4. I agreed to represent Plaintiff Richmond in this case because I felt that he was denied important Constitutional rights and wanted to assist him for altruistic reasons.
5. My law practice consists of representing primarily defendants in criminal cases and plaintiffs in civil rights, employment discrimination and personal injury matters. My representation in such cases is generally on a contingency, flat fee or mixed fee arrangement to enable individuals without adequate resources to obtain legal representation.
6. I have no memory of ever representing a Plaintiff in an employment, civil rights, or other similar type case for a set hourly fee payable by the client. I represent Plaintiffs in such cases

exclusively on a contingency basis, sometimes requiring a “costs” retainer to cover expenses. In other types of cases, even when I charge hourly rates, those rates are set at consciously sub-market rates in order to provide legal services to those who otherwise could not afford them, and more often than not are, unfortunately, never actually paid in full by the clients.

Signed under the pains and penalties of perjury this the 30th day of September, 2015.



Jeffrey T. Scrimo